

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

I, Robert J. Nelson, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Philadelphia Division, being duly sworn, depose and state as follows:

1. I am a Special Agent with the FBI, and have been since July of 2019. Since December of 2019, I have been assigned to the Philadelphia Division where I have been a member of the Child Exploitation and Human Trafficking Task Force. I have received training from the FBI in the enforcement of federal child pornography laws.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. The statements in this Affidavit are based in part on my investigation of this matter and on information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that TAYANNA BOWMAN, date of birth October 31, 1996, violated Title 18 U.S.C. Section 2252(a)(2) (Distribution of Child Pornography) on or about January 27, 2020.

INVESTIGATION

4. On January 27, 2020, a Law Enforcement Officer acting in an undercover capacity (hereafter Online Covert Employee or OCE) was utilizing the Kik application to conduct investigations of individuals trading child pornography. Kik is a mobile application designed for chatting or messaging. The OCE was monitoring the communications of the users in the Kik group

“Teen Tiny Tots,” which is known to the OCE as a group which trades child pornography.

5. On January 27, 2020, the OCE observed that Kik user “elena_mone” was a member of the group “Teen Tiny Tots.” The OCE observed “elena_mone” distribute approximately five files depicting apparent child pornography to the members of “Teen Tiny Tots.” The OCE video captured “elena_mone” distributing the files, and then downloaded the files from the group chat for further review.

6. Your Affiant reviewed the files distributed by “elena_mone,” and in your Affiant’s opinion, they depict child pornography within the meaning of Title 18 U.S.C. § 2256. Two of these files are further described below:

- a. On January 27, 2020, “elena_mone” distributed an image which depicted a prepubescent male approximately 3 to 6 years old, lying on his back with his erect penis and genitals exposed. An adult woman is performing oral sex on the prepubescent male.
- b. On January 27, 2020, “elena_mone” distributed a video which was approximately 11 seconds in length and depicted a nude adult woman lying on her back. A prepubescent male, approximately 3 to 6 years old, is standing while the adult woman is attempting to insert the prepubescent male’s erect penis into her vagina.

7. On January 30, 2020, an administrative subpoena was served to Kik for subscriber information associated to the username “elena_mone.” Among the information provided by Kik were IP addresses associated with the access to the account.

8. The Kik log in IP addresses were determined to be serviced by Comcast and Verizon.

9. On February 3, 2020, an administrative subpoena was served to Comcast for

subscriber information for one of the IP addresses used to log into the account during the time of the child pornography distribution on Kik. Among other information provided by Comcast was the subscriber's residence address associated with the IP address: 210 N. Simpson Street, Philadelphia, PA 19139.

10. On April 14, 2020, an administrative subpoena was served to Verizon for subscriber information for one of the IP addresses used to log into the account during the time of the child pornography distribution on Kik. Among other information provided by Verizon was the subscriber's physical address associated with the IP address: Cynthia's Little Treasures, located at 311 N. 63rd Street, Philadelphia, PA 19139. Your Affiant is aware that Cynthia's Little Treasures is a child day care center.

11. A query of the Accurint Law Enforcement database for 210 North Simpson Street, Philadelphia, PA 19139 resulted in records for two individuals: (1) Brandon Falletta, date of birth February 24, 1989, and (2) Tayanna E. Bowman, date of birth October 31, 1996.

12. Further investigation regarding Tayanna E. Bowman resulted in the following information:

- a. An Accurint report that listed one of her email addresses as tayabowman2015@gmail.com, which was the same email address used to register the suspect "elena_mone" Kik account.
- b. A LinkedIn profile (linkedin.com/in/tayanna-bowman-a6318311b) in the name of Tayanna Bowman, that listed Bowman's employment as a Teacher's Assistant for Cynthia's Little Treasures, the business cited above in Paragraph 10 as the subscriber of one of the IP addresses used to log in to the suspect "elena_mone" Kik account. The LinkedIn profile also contained a photograph of the person purported to be Tayanna Brown.
- c. Pennsylvania Department of Motor Vehicles (DMV) records revealed that Tayanna Elena Mo Bowman has a valid Pennsylvania driver's license, and listed her home address as 210 N. Simpson Street, Philadelphia, PA 19139. The photograph associated with the license was taken on January 2, 2019.

- d. Open source queries for the Kik username “elena_mone” revealed accounts on Instagram (display name: Tay), and Venmo (display name: Tayanna Bowman). The Instagram and Venmo accounts contained a photograph of a woman.
- e. Open source queries for “taybowman2015@gmail.com” revealed a Google account that contained a photograph of a woman, which also matched Bowman’s DMV photograph.
- f. Your Affiant compared the photographs from Bowman’s LinkedIn account, Instagram account, Venmo account, and the Google account to Bowman’s DMV photograph, and in your Affiant’s opinion, they all depict the same individual.

13. On May 29, 2020, the Honorable Judge David R. Strawbridge issued Search Warrant 20-908-M for the residence at 210 North Simpson Street, Philadelphia, PA 19139. On June 11, 2020, members of FBI Philadelphia’s Child Exploitation Task Force executed search warrant 20-908-M at 210 North Simpson Street. Defendant TAYANNA BOWMAN was not in the residence at the time of the execution of the search warrant.

14. Agents then proceeded to the daycare facility Cynthia’s Little Treasures, located at 311 N. 63rd Street, Philadelphia, PA 19139. This business is operated out of the residence at that address, and is owned and operated by BOWMAN’s grandparents. BOWMAN responded to her grandparent’s address and agreed to speak to agents. She was advised that she was not in custody and not under arrest. Among other admissions, BOWMAN identified the Kik account as her account and admitted to agents that she used that Kik account to communicate with others online and to distribute child pornography. BOWMAN provided agents with consent to search her cellular telephone and her laptop computer, and provided agents with the passwords to access the equipment. BOWMAN evidenced her consent by reviewing and signing a written consent form.

15. TAYANNA BOWMAN then agreed to accompany agents to FBI headquarters and

to take a polygraph examination. BOWMAN was advised of her Miranda rights by way of a pre-printed form, which BOWMAN read, acknowledged, and agreed to waive her rights and speak with agents. She evidenced receiving and waiving her Miranda rights by signing the written form in the presence of agents. In sum, BOWMAN again admitted that the suspect Kik account “elena_mone” was hers and that she used it to communicate with others online and to distribute child pornography. She estimated that she had distributed child pornography approximately 50 times, and that she would provide the other Kik users with hyperlinks in their communications so that they could access the child pornography. BOWMAN continued to deny that she was sexually attracted to children, but ultimately admitted that she was sexually gratified by the other users being aroused by the child pornography she sent them. BOWMAN advised that she previously worked at the day care, and currently worked with autistic children, but denied videotaping or distributing any sexually explicit images of the autistic children for whom she cares to other Kik users.

16. At the conclusion of her interview, TAYANNA BOWMAN was advised that she was under arrest and taken into custody.

CONCLUSION

17. Based upon the information above, I respectfully submit there is probable cause to believe that TAYANNA E. BOWMAN violated Title 18 U.S.C. § 2252(a)(2) (Distribution of Child Pornography) on or about January 27, 2020, as described in Attachment A.

18. Therefore I respectfully request that the attached warrant be issued authorized the arrest of TAYANNA E. BOWMAN, date of birth October 31, 1996.

/s/ Robert J. Nelson

ROBERT J. NELSON
Special Agent
Federal Bureau of Investigation

SWORN TO AND SUBSCRIBED
BEFORE ME THIS 11th DAY OF JUNE, 2020

/s/ Timothy R. Rice

HONORABLE TIMOTHY R. RICE
United States Magistrate Judge

ATTACHMENT A

Count One – Distribution of Child Pornography – 18 U.S.C. Section 2252(a)(2)

On or about January 27, 2020, in Philadelphia, in the Eastern District of Pennsylvania, defendant TAYANNA E. BOWMAN, date of birth October 31, 1996, did knowingly distribute and attempted to distribute a visual depiction using a means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, the producing of which involved the use of a minor engaged in sexually explicit conduct, and the visual depiction was of such conduct.